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Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service

FCC RM-9242

To: ~~Federal~~ Communications Commission

Reply Comments of Jeff Libby

There is a need for low power FM to serve our communities. The full power FM's in metro areas program for a mass audience with music and have some news for the main city of license, but cannot give news for each individual suburb. If they did it would alienate their audience with information that would not be pertinent to the other suburbs. There are many growing suburbs with no radio voice.

There are full power FM stations here in Kansas City more concerned about programming and commercials than informing the public of tornado warnings the evening of June 29, 1998. There were two tornado warnings for different parts of the metro Kansas City area at different times. The counties were Platte, Missouri and western Johnson, Kansas. KCCV, KMXV, KQRC, KXTR, KCFX, KOZN, KCIY and KNRX did not air the initial EAS Tornado Warning as issued by the National Weather Service, Pleasant Hill. Several minutes went by before anything was mentioned on the air, if any, by these stations. KCCV and KXTR are satellite programmed and to the best of my knowledge, the tornado warning announcements never made air on these stations. To be fair with my comments, the Entercom group of FM stations did activate the EAS. The point is which stations can be relied upon and which stations cannot. Does the general public know?

The NAB in their comments (page 23-figure 6) concerning "In Band On Channel" (IBOC) digital implementation for the existing full power FM's, will encounter a problem. There will be objectionable interference between IBOC to analog and analog to IBOC on first adjacent frequencies. There will be more than likely hundreds of full power FM stations interfering with each other. Some Kansas City area FM stations will experience interference also.

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The following points are made in favor of RM-9242--LPFM-1.

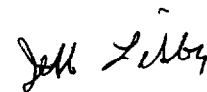
1. The Telecommunications Act of 1996 encourages competition in all fields and is concerned Big Business will make it more difficult for small businesses and minorities to enter. RM-9242 LPFM-1 can be a doorway for a small business to gain entrance and help satisfy some concerns.
2. Suburbs of metro areas, will have a radio voice where city government and community leaders can respond to the needs of the community on issues the full power broadcasters will not address.
3. The enforcement of a LPFM-1 station will be no different than a full power FM since it will have Parts 73 and 74 to follow of the Rules and Regulations. The minimum power level for a LPFM-1 station should be 100 watts. This would keep it in line with what is currently established.
4. Applicants will still have to qualify by meeting financial and technical criteria.
5. An engineering study will be required to show no interference to other stations on co-channel and first adjacent high and low.
6. LPFM-1 stations would be required to have EAS capability.

Here is an opportunity for a new class of full time FM station. A low power station with power levels of up to 3000 watts ERP, that can concentrate on a particular area of service such as a suburb or an under served rural area.

A low power FM station can provide news, severe weather reports, local sports and public affairs programming just for that community.

Please give serious consideration to RM-9242, LPFM-1

Respectfully submitted,
Jeff Libby



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CERTIFICATE OF SERVICE

I, Jeff Libby, do hereby certify that a true and correct copy of the foregoing "Reply-Comments on RM-9242" was sent via first class mail, this 9th day of July, 1998, to the following parties:

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